

REMARKS

Applicant respectfully requests reconsideration and allowance of all of the claims of the application. The status of the claims is as follows:

- Claims 1-9, 11-20, 22-24, 26, 28-30 and 33-49 are currently pending.
- Claim 30 is canceled herein.
- Claims 1, 20, 29, and 33 are amended herein.

Cited Documents

The following documents have been applied to reject one or more claims of the Application:

- **Pitkow:** Pitkow et al., U.S. Patent No. 6,457,028
- **Holbrook:** Holbrook, U.S. Patent Application Publication No. 2002/0152222
- **Grayson:** Grayson, U.S. Patent Application Publication No. 2006/0031246
- **Ikeda:** Ikeda, U.S. Patent No. 6,564,206
- **Broder:** Broder et al., U.S. Patent No. 6,349,296

§ 102 Rejections

Claims 22-24, 26, 29-31 and 33-37 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Pitkow.

Independent Claim 29

Applicant respectfully traverses the rejection. Nevertheless, for the sole purpose of expediting the prosecution of this application, Applicant amends claim 29 to include subject matter from the specification. Support for the amendment can be found in the specification at least at page 15, lines 11-25 through page 16, lines 1 and 2.

Applicant submits the cited references do not disclose or teach “wherein the link threshold is determined by selecting a number of the plurality of objects that is at least 1% of the total number of objects in the plurality of objects and multiply an amplifying frequency factor by a weight sum of all links and divide it by the number of the plurality of objects selected.” Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

Dependent Claims 30 and 49

Claims 30 and 49 ultimately depend from independent claim 29. As discussed above, claim 29 is not anticipated by the cited documents, and is therefore allowable over the cited documents. Therefore, dependent claims 30 and 49 are also allowable over the cited documents of record for at least its dependency on an allowable base claim. Additionally, these claims may also be allowable for the additional features that it recites.

Independent Claim 33

Applicant respectfully traverses the rejection. Nevertheless, for the sole purpose of expediting the prosecution of this application, Applicant amends claim 33 to

include subject matter from the specification. Support for the amendment can be found in the specification at least at page 18, lines 12-25 through page 19, lines 1-11.

Applicant submits the cited references do not disclose or teach “wherein the finding of sufficient similarity is determined when smallest values from the first of the communities and the second of the communities divided by a set that includes all elements that the first and second communities have in common is less than two.” Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

Dependent Claims 34-37

Claims 34-37 ultimately depend from independent claim 33. As discussed above, claim 33 is allowable over the cited documents. Therefore, claims 34-37 are also allowable over the cited documents of record for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

§ 103 Rejections

Claims 1-9, 1-15, 18-20 and 45-48 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Pitkow in view of Holbrook.

Claims 16-17, 28 and 38-43 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Pitkow and Holbrook in view of Grayson.

Claim 44 stands rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Pitkow in view of Ikeda.

Independent Claim 1

Applicant traverses the rejection for claim 1. Nevertheless, for the sole purpose of expediting the prosecution of this application, Applicant amends claim 1 to include subject matter from the specification. Support for the amendment can be found in the specification at least at page 10, lines 11-20. Applicant submits that the combination of Pitkow and Holbrook does not teach or suggest the following feature of this claim, as amended (with emphasis added):

- wherein each concentric portion represents an importance level to the community and the closer each concentric portion is to the center portion represents a higher level of importance for the **affiliated objects with that concentric portion and that each affiliated object within each concentric portion shares the same importance level**

The Office admits that the Pitkow reference does not disclose assigning a set of core objects to a center portion of a user interface or a set of affiliated objects assigned to concentric portions around the center portion. (Office Action, pg. 10). The Office alleges that the Holbrook reference remedies the deficiencies of the Pitkow reference.

The Holbrook reference generally relates to a three dimensional graphical user interface that enables navigation of unstructured lists of data elements, like search results of a database. (Holbrook, abstract). For example, an internet search returns a list of web sites and the Holbrook reference describes assigning a rank and a parent category to each website. (Holbrook, col. 10, lines 31-55). The parent category's assignments reflect the characteristics of each website, while the rankings reflect the

amount of relative significance between each of the websites regardless of their parent category. (Holbrook, Fig. 4). The Holbrook reference describes a user interface that displays parent categories represented by a circle; with circles within each parent category circle that represent each website assigned to that parent category. (Holbrook, Fig. 4). For each website, each circle has a number that reflects its relative rank to all websites produced by the internet search. (Holbrook, Fig. 4).

The Office alleges that “the arrangement of objects shown in Fig. 4 supports the inherent data organization in the data structure, since without the underlying data structure organized in the way displayed to the user, the display of categorized objects in concentric circles could not be achieved. Just because the objects are displayed in a certain way, it does not suggest that they are graphics dependent.” (Office Action, pg. 10). Applicant respectfully assumes the Office is suggesting the mere presentation of the parent categories with the web site circles implies an inherent data structure that can be used to present the search data in any manner that is claimed by the Applicant since the data is not graphics dependent. Applicant respectfully disagrees. Applicant submits that the inherent data structure or the graphical representation of that data structure as disclosed in the Holbrook reference fails to disclose or teach “wherein each concentric portion represents an importance level to the community and the closer each concentric portion is to the center portion represents a higher level of importance for the affiliated objects with that concentric portion and that each affiliated object within each concentric portion shares the same importance level.” Applicant respectfully submits that Fig. 4, in the Holbrook reference, teaches away from the amended feature by combining items (web sites) within a circle such that each circle has a different rank or

level of importance. In contrast, claim 1 recites “each affiliated object within each concentric portion shares the same importance level.” Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

Dependent Claims 2-9 and 11-19

Claims 2-9 and 11-19 ultimately depend from independent claim 1. As discussed above, claim 1 is allowable over the cited documents. Therefore, claims 2-9 and 11-19 are also allowable over the cited documents of record for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

Independent Claim 20

Applicant traverses the rejection for claim 20. Nevertheless, for the sole purpose of expediting the prosecution of this application, Applicant amends claim 20 to include subject matter from the specification. Support for the amendment can be found in the specification at least at page 10, lines 11-20.

Applicant submits that the combination of Pitkow and Holbrook does not teach or suggest the following “wherein each concentric portion represents an importance level to the community and the closer each concentric portion is to the center portion represents a higher level of importance for the affiliated objects with that concentric portion and that each affiliated object within each concentric portion shares the same importance level.” Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

Dependent Claims 22-24, 26, and 28

Claims 22-24, 26, and 28 ultimately depend from independent claim 20. As discussed above, claim 20 is allowable over the cited documents. Therefore, claims 22-24, 26, and 28 are also allowable over the cited documents of record for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

Independent Claim 38

Applicant traverses the rejection for claim 38. The claim has not been amended and Applicant respectfully submits that the combination of Pitkow and Holbrook does not disclose or teach the following feature (with emphasis added):

- grouping a second collection of the plurality of objects into a plurality of concentric portions around the center portion so that **all objects of the second collection that are grouped in a particular one of the concentric portions have a same rank**

The Office admits that the Pitkow reference does not explicitly disclose the collection of objects into a center portion and into one or more concentric portions and alleges that the Holbrook reference remedies the deficiencies of the Pitkow reference. (Office Action, pg. 20).

The Holbrook reference describes a plurality of parent categories represented by individual circles and parent category circles that contain one or more ranking circles that represent individual websites. (Holbrook, Fig. 4). Each of the ranking circles include a number in the circle that reflects the website a rank relative to the other

websites. Hence, each parent category circle groups together a plurality of websites that are ranked against one another, such that each website within the circle has a different rank. (Holbrook, Fig. 4). In contrast, claim 38 recites “that **all objects of the second collection that are grouped in a particular one of the concentric portions have a same rank.**” Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

Dependent Claims 39-43

Claims 39-43 ultimately depend from independent claim 38. As discussed above, claim 38 is allowable over the cited documents. Therefore, claims 39-43 are also allowable over the cited documents of record for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

Independent Claim 44

Applicant traverses the rejection for claim 44. Applicant respectfully submits that the combination of Pitkow and Ikeda does not disclose or teach the following unamended feature (with emphasis added):

- assigning a group of affiliated objects of the community to a plurality of data circles of the set of concentric data circles, **wherein all of the objects of the group of affiliated objects having a same rank are assigned to a same one of the set of concentric data circles**, and wherein the set of concentric

data circles facilitates traversal of the community of objects independent of a user interface

The Office admits that the Pitkow reference does not explicitly disclose a collection of objects into a center data circle and another collection of objects having a same rank are assigned to the same concentric circle and alleges that the Ikeda reference remedies the deficiencies of the Pitkow reference. (Office Action, pg. 22).

The Ikeda reference is generally directed to an information search apparatus that calculates similarity values between the query conditions and provides several embodiments in how to display the data. (Ikeda, abstract). One embodiment describes “a matched zone that is defined by a circular zone which is concentric with the search result display region, the respective scale marks are displayed as circles concentric with the matched zone, and images as search results are displayed to be laid out in a radial pattern from the center of the search result display so that their similarity values correspond to the distances from the matched zone.” (Ikeda, col. 24 lines 1-5). As shown in Fig. 6 of the Ikeda reference, the search results straddle different concentric circles or are located at different positions within the circle. Clearly, the circles are indicators of a certain radius distance from the center zone and that regions between the concentric circles are determinative of different distances. For example, if two search results have the same exact radius they would be located in the same concentric circle. However, based on the different radius distances between two concentric circles, two search results could also be in the same concentric circle but have two different radii. Moreover, Ikeda refers to the circles as scale marks that are intended to mark different distances from the matched zone. Therefore two different positions within the

same concentric circle dictate two different similarity values, hence two different ranks. As result, the Ikeda reference fails to disclose or teach “**wherein all of the objects of the group of affiliated objects having a same rank are assigned to a same one of the set of concentric data circles.**” Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

Dependent Claims 45-48

Claims 45-48 ultimately depend from independent claim 44. As discussed above, claim 44 is allowable over the cited documents. Therefore, claims 45-48 are also allowable over the cited documents of record for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

Conclusion

Applicant submits that all pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Examiner is urged to contact the undersigned representative for the Applicant before issuing a subsequent Action.

Respectfully Submitted,

Lee & Hayes, PLLC
Representative for Applicant

/Jason D. Mehigan/ Dated: 7/2/09
Jason D. Mehigan (jasonm@leehayes.com; 509-944-4743)
Registration No. 64,307

Christopher W. Lattin (christopher@leehayes.com; 509-944-4763)
Registration No. 56,064